

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.,
Plaintiff, Counter-defendant

v.

APPLE INC.,
Defendant, Counter-claimant

IN RE APPLE IPHONE ANTITRUST
LITIGATION

DONALD R. CAMERON, *et al.*,
Plaintiffs

v.

APPLE INC.,
Defendant.

Case No. 4:20-cv-05640-YGR-TSH
Case No. 4:11-cv-06714-YGR-TSH
Case No. 4:19-cv-03074-YGR-TSH

**[PROPOSED] ORDER RE: MOTIONS TO
SEAL**

Hon. Thomas S. Hixson

Plaintiffs' January 20, 2021 and January 21, 2021 motions to seal are granted. The following documents will be partially or entirely sealed:

Document	Redacted Material
Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Confidential business information discussed in internal documents and deposition testimony, including information regarding Apple's internal structure, strategic decisionmaking, and allocation of responsibilities
Exhibit 1 to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Material not cited to or relied on by either party
Exhibit A to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Sealed in its entirety
Exhibit B to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Email addresses of individual recipients and senders
Exhibit C to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Addressees and body of email discussing business strategy and decisionmaking

Exhibit D to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Sealed in its entirety
Exhibit E to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Addressees and body of email discussing business strategy and decisionmaking
Exhibit F to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Addressees and body of email discussing business strategy and decisionmaking
Exhibit G to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Sealed in its entirety
Exhibit H to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Sealed in its entirety
Exhibit I to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Page 45 Page 182, lines 1–3 Page 183, lines 20–24 Page 184–88 Page 201 Page 289, lines 7–11 Page 334 Page 335, lines 1–12
Exhibit J to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Page 13 Page 14, lines 1–23 Page 65, lines 1–6, 14–25 Page 112, lines 7–25 Page 113 Page 114, lines 1–17, 24–25 Page 138, lines 1–8, 22–23 Page 139, lines 1–25 Page 140–41 Page 177, lines 1–10, 21–25 Page 178 Page 196–97 Page 292, lines 3–25 Page 293, lines 1–16, 20–25 Page 302–03
Exhibit K to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Page 107 Page 369 Pages 404–05
Exhibit L to Joint Discovery Letter Brief Regarding Cue and Federighi Depositions	Page 24, lines 1–11 Page 26, line 5 Pages 113–15 Page 379 Page 380, lines 1–5

	Page 397, lines 1–3, 16–25 Pages 398–400 Page 401, lines 1–24 Page 403, lines 6–10 Page 404, lines 14–25 Pages 405–09 Page 410, lines 1–2, 15–25 Page 412, lines 10–25
Joint Discovery Letter Brief Regarding Cook Deposition	Confidential business information discussed in internal documents and deposition testimony, including information regarding Apple’s internal structure, strategic decisionmaking, and allocation of responsibilities.
Exhibit C to Joint Discovery Letter Brief Regarding Cook Deposition	Addressees and body of email discussing business strategy and decisionmaking, personal information about third party
Exhibit D to Joint Discovery Letter Brief Regarding Cook Deposition	Addressees and body of email discussing business strategy and decisionmaking, personal information about third party
Exhibit E to Joint Discovery Letter Brief Regarding Cook Deposition	Addressees and body of email discussing business strategy and decisionmaking, personal information about third party
Exhibit F to Joint Discovery Letter Brief Regarding Cook Deposition	Page 286, lines 1–4, 6–10, 20–21, 23–24 Page 289, lines 7–11
Exhibit G to Joint Discovery Letter Brief Regarding Cook Deposition	Page 26, line 5 Page 118, lines 3–4, 10, 13–25 Pages 119–20

Dated: _____, 2021

THOMAS S. HIXSON
United States Magistrate Judge